

## HARVEY &amp; HACKETT

THE GRAYBAR BUILDING

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NEW YORK, NY 10170

(212) 972-8935

VIA EMAIL

July 11, 2019

Ms. Graham Robinson  
1192 Park Avenue  
Apt 7D  
New York, NY

Re: Canal Productions Inc./Robert De Niro

Dear Chase,

I was asked to respond to your recent emails addressed to Bob. Please note that Bob does not wish to communicate with you. As such, please direct correspondence regarding this matter to me.

A review of Canal Productions Inc.'s ("Canal") various credit card, petty cash, and other accounts, reveals that you were involved in widespread abuses and unauthorized transactions during your employment.

It now appears that for more than four (4) years you have, without authorization, charged to Canal an extraordinary number of personal expenses. These include food, transportation (such as Uber and taxis), dog-sitting, groceries, cameras, iPhone, subscriptions to magazines and newspapers, Pilates classes, dry-cleaning, flowers for your residence, an unknown number of gift cards, and helped yourself to petty cash.

In addition, you converted Canal's and Bob's American Express Membership Rewards Points into more than Seven (7) Million Delta SkyMiles over the past two (2) years without permission or authorization. You subsequently used almost three (3) Million SkyMiles for personal travel without permission and thereafter transferred approximately 4.5 Million SkyMiles into your personal account without authorization. The value of the foregoing is approximately \$300,000.

Simply, you wrongly took the SkyMiles and seem intent on depriving Canal/Bob of the same.

I strongly suggest you speak to an attorney and return the SkyMiles immediately.

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A review of Canal's payroll records and emails indicate that you represented that over the past four (4) years, you took only one (1) vacation day. This is false, and upon information and belief, approximately four (4) years ago, you improperly implemented a benefit for yourself whereby you were paid by Canal for "unused" vacation days.

Putting aside the fact that the foregoing benefit was never approved, you in fact did take vacation on a regular basis including, but not limited to, a trip to Hawaii from on or about December 24, 2018 to December 30, 2018. Despite your week-long absence, you advised Canal employees that there were office holidays for only December 24 and December 25, 2018. While others worked, you relaxed.

In addition, from September 28, 2018 until October 21, 2018, you were on vacation in London and improperly charged Canal for cabs and food during this trip.

Then again, from November 18, 2018 to December 5, 2018, you were on vacation in London (and used the Canal SkyMiles on at least one leg of the trip). While it is unclear as of this date who paid for your lodging while in London, you charged various incidentals to Canal without permission or authorization.

I could go on, but the reality is that you took extensive vacations over the past four (4) years and used Canal's SkyMiles and credit card to fund your personal excursions. Notwithstanding the foregoing, you were paid for "unused" vacation based upon your misrepresentations.

Interestingly, you received authorization to go to Los Angeles on Canal business from March 9, 2018 to March 12, 2018, because you said that you needed to have various people autograph a number of limited edition TAXI DRIVER books which you didn't wish to ship. However, the books that you supposedly needed to have signed were not even available until after your trip. It now appears that the real reason you traveled to Los Angeles during this time frame was to attend a friend's birthday party. This type of misrepresentation does not appear to be limited.

Please note that during the foregoing trip, you charged the following expenses: \$2,600.00 for your stay at the Montage Hotel; \$156 to eat at Nobu LA; \$604 to eat at Nobu LA a second night, and \$729 for a rental car. Worse, even though you had a rental car, you also spent several hundred dollars on Uber in Los Angeles and showed your appreciation by tipping \$190 to people who made your stay more comfortable.

Your actions demonstrate a complete breach of trust.

I strongly urge you to mitigate the damages you have caused and return the various computers, iPhones, cameras and other property in your possession that belongs to Canal.

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Unfortunately Bob believes that you breached your fiduciary duty and obligation of loyalty and enriched yourself using various methods, including but not limited to converting petty cash to your own use, buying gift cards and using the same for your personal needs, charging Canal for personal expenses, etc.

I strongly urge you to speak to an attorney and understand that saying "Bob said is ok" is not going to work. The reality is that you used your position to enrich yourself at Bob's expense.

Please return the SkyMiles immediately to avoid legal action.

Feel free to have your attorney contact me.

Sincerely,

  
Tom Harvey